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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

22 G.M., a minor, by and through AUDREY
23 GUARDANAPO and SHAUN
24 GUARDANAPO,

25 Plaintiff,

26 v.

27 WASHOE COUNTY SCHOOL DISTRICT,

28 Defendant.

Case No.: 3:18-cv-00172

**JOINT STIPULATION FOR ENTRY OF
STIPULATED JUDGMENT AND
[PROPOSED] STIPULATED JUDGMENT**

Judge: Hon. Robert C. Jones
Action Filed: April 24, 2018

1 Plaintiff G.M., by and through Audrey Guardanapo and Shaun Guardanapo as his next
2 friends, and Defendant Washoe County School District, hereby inform the Court that they have
3 reached a settlement in this action.

4 Defendant has formally revised the Washoe County School District Parent/Student
5 Handbook, Kendyl Depoali Middle School dress code, and all other site-specific dress codes to
6 remove the prohibition against clothes containing “anything that promotes weapons.” Defendant
7 has communicated this change in policy to all affected administrators, school site personnel, sites,
8 campuses, parents, and students.

9 Defendant acknowledges that its application of the Washoe County School District dress
10 code and the Kendyl Depoali Middle School dress code to Plaintiff G.M. violated his rights
11 secured by the First Amendment to the United States Constitution.

12 Defendant will pay \$25,000 for Plaintiff’s attorney’s fees for full and complete resolution
13 of the Complaint. Plaintiff may not bring any additional motions for damages, fees, and costs, as
14 well as any claims associated with the facts and circumstances alleged in his Complaint. Plaintiff
15 waives any right to bring any further claims associated with the facts and circumstances alleged in
16 his Complaint against Kendyl Depoali Middle School and Joye Ancina, in her official capacity as
17 Principal of Kendyl Depoali Middle School.

18 Accordingly, the parties jointly request that the Court enter the attached Proposed
19 Stipulated Judgment being lodged simultaneously herewith.
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1 Dated: July 6, 2018

THE O'MARA LAW FIRM, P.C.

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3 By /s David C. O'Mara
4 DAVID C. O'MARA
Attorneys for Plaintiff

5 Dated: July 6, 2018

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7 By /s Neil A. Rombardo
8 NEIL A. ROMBARDO
Chief General Counsel,
9 Washoe County School District
Attorneys for Defendant